

EXHIBIT 2

DECLARATION OF SONYA HOOKER

I, Sonya Hooker, of full age, pursuant to section 1746 of title 28 of the United States Code, hereby declare under penalty of perjury as follows:

1. I am the daughter and adult sponsor of my mother, Sybil Rummage, who is a resident at the Citadel Salisbury nursing home at 710 Julian Road in Salisbury.
2. My mother tries to keep up with me and stays in close touch with me.
3. While she has physical disabilities, I consider her a lucid person.
4. I understand that I am a Plaintiff or a person suing in a class action lawsuit that claims the facility has been understaffed and that the owners of The Citadel did not provide us with proper contract documents and information.
5. I have a general understanding of the nature of the allegations and the claims found in our Class Action Complaint.
6. I strongly believe the facility has been understaffed.
7. I strongly believe that when the new owners of the facility took over on February 1, 2020, they failed to give me or my family complete or accurate information about their business.
8. I strongly believe the owners of the facility have failed to spend the money it takes to properly pay for nursing staff, supplies and medications.

9. I understand that as a Plaintiff in a class action lawsuit, I have a duty to look out for the other residents and sponsors whom I represent, and try to obtain justice for them.

10. I desire to be appointed as a Class Representative and I promise and represent to the Court that if appointed, I will seek to make decisions regarding this lawsuit that go to the best interests of the class of individuals whom I would represent.

11. I respectfully ask that the Court appoint me as a Class Representative, appoint my lawyers at Wallace and Graham as the Class Counsel, and allow this case to go forward as a class action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 14th day of May, 2021 in Salisbury, North Carolina.

Sonya Hooker
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